

OMEGA CHEMICAL SITE PRP ORGANIZED GROUP

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September 7, 2012

Mr. Fred Schaffler
Section Chief
U.S. Environmental Protection Agency-Region IX
75 Hawthorne Street (SFD-7-4)
San Francisco, CA 94105

Re: *OPOG Comments on the Significance of the EPA 2012 Groundwater Monitoring Report for 2010 and 2011 (June 2012) on EPA's Remedy Selection for OU2 at the Omega Chemical Superfund Site*

Dear Mr. Schaffler:

This memorandum has been prepared to document OPOG's view of significant data presented in the Groundwater Monitoring Report for 2010 and 2011, dated June 2012, as it relates to EPA's remedy selection for OU2 at the Omega Chemical Superfund Site in Whittier, California. Two key observations can be made based on the data presented in the aforementioned report. Specifically, the decreasing Tetrachloroethylene (PCE) and Trichloroethylene (TCE) trends (1) suggest that active groundwater extraction and treatment may not be required for the Leading Edge and, therefore, consistent with EPA's own guidance, Monitored Natural Attenuation (MNA) may be a far more effective remediation approach, and (2) the migration of contaminants from up-gradient areas may be occurring at a considerably slower rate than postulated in the EPA Feasibility Study (FS).

As presented in the attached figures, the lateral extent of contamination for PCE and TCE is retracted when compared with EPA's 2007 Remedial Investigation (RI) plume characterization and EPA's August 2010 RI/FS characterization of the plume. This retracted plume position is supported by EPA's contractor's own interpretation as presented in the June 2012 report. In reaching its 2010 conclusion on Omega's contribution to the OU2 plume, EPA's analysis was highly dependent upon a set of hydropunch data taken from the shallow groundwater zone. As demonstrated by the results from the ongoing EPA groundwater monitoring well tests, these hydropunch data may have been representative of local contaminant sources but not of the migration of mass from the Omega site. Since EPA has not repeated testing from hydropunch locations, EPA cannot determine whether these shallow hydropunch wells remain contaminated with releases from local sources. However, a review of the groundwater monitoring well data from 2007 through 2011 clearly supports the premise that the Omega plume never reached MW-28, MW-29, or MW-30.

PCE, which according to EPA accounts for 98% of the risk associated with human health exposure, has not been detected in MW-30 above the method detection limits since sampling began in 2007. Concentrations of PCE in three of the leading edge monitoring wells (MW-28, MW-29 and MW-30) have

not been detected above the 5 ug/l maximum contaminant level since sampling began in 2007. It appears that based on a comparison of the 2007 RI 5 ug/l plume contours, based on hydropunch data, and the 2011 5 ug/l plume contours for PCE based on groundwater monitoring well data, EPA's depiction of the PCE plume has retracted approximately 1,500 feet northward (see attached PCE comparison figure). This retracted distance appears conservative in that the concentrations used to bound the southern plume contour are significantly below 5 ug/l and as such could be placed much closer to the Cenco well MW-710. This interpretation could retract EPA's 2007 PCE 5 ug/l contour by as much as 2,500 feet from the 2007 RI interpretation.

In addition to examining the horizontal extent of the plume in the leading edge, we also examined the vertical distribution of PCE in the leading edge. Comparison of vertical distribution of PCE between 2007 and 2011, specifically along cross section C-C', demonstrate that attenuation of COCs is occurring and that the need for active remediation in the leading edge is not supported by the data collected. The vertical contaminant profile at MW-27 is striking in the degree to which the spatial distribution of PCE above 100 ug/l is reduced substantially. This further supports the use of a MNA remedy in the leading edge along with source control, as necessary, for individual properties in the leading edge that continue to contribute mass to the plume.

TCE plume contours exhibit similar behavior to that of PCE and the resulting 2011 data interpretation is a plume length that is approximately 2,000 feet less than EPA's 2007 RI/FS interpretation. Data trends in the aforementioned three leading edge monitoring wells mimic those of PCE in a downward trend (see TCE comparison figure). As with PCE, the TCE 5 ug/l contour boundary could reasonably be placed closer to the Cenco well identified as MW-710 thereby resulting in a further retraction of an additional 1,500 for a total of 3,000 feet. In fact, a review of the data presented in the June 2012 groundwater monitoring report demonstrate that none of the contaminants of concern for OU2 have expanded and additional COCs have retracted when compared with EPA's RI/FS characterization.

One final observation relates to the groundwater flow contours. These flow contours suggest that contamination from the Ashland Facility could indeed make contact with the eastern edge of the OU2 plume boundary. This is a position that OPOG has presented in the past. OPOG is encouraged by the recommendations in the Report to collect additional information from this facility as well as others via increased communication with State regulatory entities. OPOG also supports collection and analysis of Freons from Cenco and WDI wells to facilitate a more comprehensive assessment of Freon distribution and behavior in OU2.

Should you have any questions regarding the points raised in this letter or wish to discuss these points in more detail, please contact Jack Keener or myself. We can both be reached at 619-546-8377.

Sincerely,



Ed Modiano
OPOG Project Coordinator

cc: Steve Berninger
Linda Deschambault
Tom Perina



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